Message

From: Chesnutt, John [Chesnutt.John@epa.gov]

Sent: 12/8/2020 7:45:03 PM

To: Praskins, Wayne [Praskins.Wayne@epa.gov]

Subject: Re: draft text

Thanks

On Dec 8, 2020, at 10:13 AM, Praskins, Wayne <Praskins.Wayne@epa.gov> wrote:

John -

Here is some suggested text for an email to HQ. May want to modify after our call at 1:30.

(If we invoke dispute resolution under the HPNS FFA...), we expect that one of the primary topics of discussion will be the level of conservatism designed into the RESRAD BUILD and BPRG calculators for removable radiological contamination (i.e., dust). For the radionuclides of concern at HPNS, the BPRG calculator, using default parameters, estimates risks from removable contamination several orders of magnitude higher than RESRAD BUILD.

The BPRG calculator estimates risk by multiplying a contaminant concentration by four exposure factors: hand-to-mouth frequency, finger surface area, fraction transferred from surface to skin, and saliva extraction factor. We encourage you to be prepared to explain the basis for the default values for the four factors, and the use of the product of the four factors to estimate risk. We expect the Navy to take the position that the BPRG calculator generates overly conservative estimates of risk.

Wayne Praskins | Superfund Project Manager U.S. Environmental Protection Agency Region 9 75 Hawthorne St. (SFD-7-3) San Francisco, CA 94105 415-972-3181